

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HENRIETTA WILSON

Plaintiff,

v.

PRIMESOURCE HEALTH CARE OF OHIO,
et al.

Defendants.

CASE NO. 1:16-cv-01289

JUDGE JAMES GWIN

**AFFIDAVIT OF HENRIETTA
WILSON**

I, Henrietta Wilson, duly sworn in and under oath hereby state the following truths:

1. I am a former employee of PrimeSource, and I have personal knowledge of the facts stated herein.
2. As a Clinical Assistant, I regularly worked more than 40 hours a week within various nursing homes, but I was not paid overtime.
3. I also required to perform several home duties in the evening, to included inventorying and packaging supplies and equipment, cleaning and sterilizing equipment, conducting spore test, restocking and ordering supplies, and faxing and scanning voluminous documents.
4. I was required to perform my home duties as soon as I walked in the door. I was told that my paperwork, scanning, faxing, and synching had to be done as soon as I got home so employees working in the home office could meet their deadlines.
5. As a practical matter, I had to start working immediately when I got home because if I did not, I would never get to bed. Even then I was frequently up until the early morning hours attempting to complete all my work.
6. In the mornings, I had several other tasks I had to perform before I got in the car. These tasks included checking inventory (in dental), going over new visit list, list of glasses adjustments that were needed (in all services), and using the dolly to load equipment.
7. Every morning and evening I had to load hundreds of pounds of medical equipment and supplies in and out of the truck PrimeSource gave me. I would have to use a dolly and make two to three trips. The equipment I had to haul was necessary for the physicians to provide their services. I also had to deliver the supplies to the facilities I was working at and to other facilities. If someone called off, or if there was a shipping error, I was often required to meet with other Clinical Assistant and physicians to exchange supplies and equipment. This would happen either during my travel, in the morning, or after I got home in the evening, depending on the circumstances.

8. In fact, the equipment I was required to haul was so heavy that on November 15, 2015, I injured myself delivering equipment to a facility. My injuries consisted of a sprained neck, a torn rotator cuff, a sprained back, and a sprained arm. I filed a claim for Worker's Compensation benefits because of this injury.
9. During the Rideshare to a facility, I and Patient Assistants were required to come up with a plan with how we were going to perform our visit, to discuss whether we planned to take lunch or not during a visit, who was to perform certain task, and to share knowledge regarding the facility if they had been there before.
10. Every once in a while, I would talk with Patient Assistants about life, or listen to the radio during a RideShare. But, this was rare. There typically was little to no time to carry on personal conversations during a RideShare.
11. As a clinical assistant, I was provided with a prosthetics handbook ("Prosthetics Handbook").
12. A true and accurate copy of the Prosthetics Handbook I received is attached hereto as Exhibit A.
13. I also received instructions on how to use PrimeSource's tablet and scanning equipment. ("Tablet Manual").
14. A true and accurate copy of the Tablet Manual I received is attached hereto as Exhibit B.
15. As outlined in the Tablet Manual and Prosthetics Handbook, there were several steps I and other Clinical Assistants were required to take to scan documents, order supplies, and to synch my tablet, beyond merely pressing a button.
16. I also received instructions on how to use sterilizing machines and other equipment ("Instructions").
17. A true and accurate copy of the Instructions I received is attached hereto as Exhibit C.
18. The Instructions accurately describe all the steps to using the equipment, which was far more complex than merely pressing a button.

FURTHER AFFIANT SAYETH NAUGHT.

Henrietta Wilson
Henrietta Wilson

The above appeared before me on this 8th day of March, 2017, and

under oath and of her own free will did sign the above.



CHRISTOPHER P. WIDE
Attorney At Law
NOTARY PUBLIC
STATE OF OHIO
My Commission Has
No Expiration Date
Section 147.03 O.R.C.

[Signature]
NOTARY PUBLIC